R. Michael Turnnspeed, Director

ALLEN BIAGGI. Administrator

(775) 687-4670 TDD 687-4678

Administration Water Pollution Control Facsimile 687-5856 Mining Regulations & Reclamation Facsimile 684-5259



Waste Management Corrective Actions Federal Facilities

Air Quality Water Quality Planning

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DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

## DIVISION OF ENVIRONMENTAL PROTECTION

333 W. Nye Lane, Room 138 Carson City, Nevada 89706

June 10, 2002

Colonel Delwyn R. Eulberg Commander 99Air Base Wing 4430 Grissom Ave Ste 110 Nellis AFB, NV 89191-6520

## **SUBJECT:** FY'01 Range Decontamination Report

The report, as written, provides more detailed information than previous reports, however it still lacks sufficient detail to adequately respond to items (3) & (4) of section 3017 of Public Law 106-65. The Nellis Test and Training Range (NTTR) has been an active range for over 50 years. As presented, the report makes no attempt to define the extent of historic ordinance contamination, which is the first step or action necessary to estimate the costs for decontamination of the entire range. It is recognized that the DoD is conducting research in these areas but, a discussion of historic range contamination would at least provide some scope of the potential for future assessment activities.

In addition, there are some errors contained in item No. 6. of the report relating to the Plutonium contamination on the Range. A clean up level at 200 pCi/g for the Rancher Farmer scenario would provide for only a 47 mrem dose rate. Based on NNSA/NV's original calculations for this scenario, if the agreed to dose rate of 25 mrem is to be achieved, the clean up level must go down to approximately 106 pCi/g. The areas requiring remediation will significantly increase in size and therefore the costs presented will significantly increase.

It is recognized that in the future, methodologies and technologies for assessment and remediation may change. However, the information presented in the existing report should, as accurately as possible, present the site conditions and remediation alternatives as they exist today.

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## Paul Liebendorfer, P.E. Chief

Cc: Col. B. Percival, 98 RANW/CC Karen Beckley, NDEP/CC John Walker, NDEP/CC Don Elle, NDEP/LV Heather Elliot, State Clearinghouse

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